EMERGENCY REQUEST FOR EXPEDITED APPROVAL
OF VONAGE'S PETITION FOR LIMITED WAIVER
OF SECTION 52.15(g)(2)(i)

ATTACHMENT 1

BELLSOUTH LETTER

DATED MAY 19, 2005

BELLSOUTH

Bell **South** Corporation
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<u>VIA FACSIMILE AND REGULAR US MAIL</u> May 19, 2005

Mr. Jeffrey Citron
Chairman
Vonage Holding Corp
2147 Route 27 Edison,
NJ, 08817

Dear Mr. Citron,

I am writing in response to your latest letter of May 9, 2005. I was pleased to learn that our teams held a conference call on May 13, 2005, to begin to work through the technical aspects of our E-911 offer to Vonage. As previously communicated to Vonage, we are offering to provide Vonage with the elements that we offer to wireless service providers for the purpose of providing E-911 services to customers.

You have stated numerous times that Vonage seeks access to 9-1-1 in a similar manner to wireless carriers. As such, I thought it would be helpful to describe BellSouth's Commercial Mobile Radio Service (CMRS) offering. Today BellSouth provides E-911 connectivity to CMRS providers based on industry standards. The connectivity to the E-911 tandem network requires the purchase by the CMRS provider of a minimum of two redundant trunks from the CMRS switch to each of the 9-1-1 tandems. A Mobile Positioning Center (MPC) connected to Positioning Determining Equipment (PDE) provides the dynamic update to the Automatic Location Identification (ALI) database with the wireless call back number and caller's location information. Additional facilities are required between the MPC and the ALI database to dynamically pass this information. Generally, wireless carriers contract with a third party vendor for the development of the MPC and PDE functionality. BellSouth does not currently provide the MPC/PDE functionality to any carrier or service provider.

Determining the proper Public Safety Answering Point (PSAP) to which wireless 9-1-1 calls should be routed is a matter that must be negotiated between the CMRS provider and the PSAPs in the serving areas. Once agreement has been reached between the CMRS provider and the PSAP, BellSouth is notified, and BellSouth works with the CMRS provider to identify which E-911 selective routers should be used to route calls to a specific PSAP and to provide information for ordering and interfacing with the BellSouth ALI databases.

CMRS providers who deliver E-911 calls to PSAPs served by BellSouth selective routers assign the pANI (pseudo-Automatic Number Identification) from the CMRS provider's number pool, which must be geographically correct for the servicing area.[1] BellSouth does not currently provide pANIs for any providers, CMRS providers must work directly with the BellSouth ALI database vendor, Intrado, to include the pANI numbers in the appropriate security tables and to identify the appropriate MPC interface to invoke for dynamically updating the ALI database as 9-1-1 calls are passed to the PSAP, The CMRS provider must contact Intrado for all database related steps necessary for the establishment and maintenance of database records and interfaces to the ALI computers, CMRS providers must post valid records in the E-911 database prior to testing or turning up service and must ensure that all data records sent to the database have a Master Street Address Guide (MSAG) valid address.

Using the CMRS offering as the baseline, BellSouth is offering equivalent 9-1-1 infrastructure network access to VoIP providers. First, as Vonage requests, BellSouth will provide access to its E-911 or selective routers, and the VoIP provider is responsible for purchasing a minimum of two trunks for each E-911 selective router. The VoIP provider is responsible for establishing a Point of Interface within the E-911 tandem serving area and for providing the IP to TDM conversion function from its network to the Point of Interface. Once the Point of Interface and trunks are established, BellSouth will provide transport of the voice call and the AMI to the designated PSAP.

Second, the VoIP provider is responsible for coordination with the PSAPs to agree on addressing formats, coordinate service areas and obtain the associated routing, default routing and contingency routing requirements, which must subsequently be provided to BellSouth, The VoIP provider is responsible for providing the caller's location information and negotiating approval of the use of data fields in the ALI display with the PSAP.

Third, the VoIP provider is responsible for provisioning and assignment of AMI and pANI that are local to the E-911 Selective Router from its own pool of numbers. As BellSouth has previously discussed with Vonage, CMRS providers - and not BellSouth - perform this function today. As such, BellSouth is offering to Vonage a product whereby Vonage would administer pANI assignment and provisioning, just as CMRS providers currently do in BellSouth's region.

Fourth. BellSouth will provide database services via our vendor which includes edits, posting, and return of errors for resolution to the VoIP provider. The VoIP provider is responsible for providing valid location subscriber records in the required format. Although BellSouth will provide interface and dynamic database services, the VoIP provider is responsible for obtaining connectivity to the ALI database for MPCA/PC (Mobile Positioning Center/VoIP Positioning Center) connectivity on an IP level. Today, BellSouth provides wireless carriers an interface to its ALI database that enables the wireless carrier (or its vendor) to dynamically update the ALI records with location information on a real time basis.

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[1] The pAM is the telephone number that can be used to designate 9 specific cell antenna face (referred to as ESRD cur Emergency Services Routing Digits) or the appropriate PSAP (referred to as ESR.K - Emergency Services Routing Keys - for CMRfi providers or ESQK - Emergency Services Qiieiy Key -for VoIP providers).

While BellSouth has not had occasion to test a specific implementation for VoIP service connecting to the E-911 platform, it is Our expectation that VoIP providers can make dynamic updates for nomadic users via the same interface used today by the wireless carriers.   The VoIP provider is responsible for nomadic subscriber records (dynamic updates) in the MPC/VPC. BellSouth does not provide MPC/VPC service today, although it can be obtained through third party vendors offering such services. Should any changes be required to the interface used by wireless carriers to support dynamic update capability, or to the platform more generally, to support Vonage's implementation, that may have an impact on the timing for service availability and on service pricing, we would obviously need to review such issues if any arise.

Fifth, utilizing BellSouth's offering, a VoIP provider would send the appropriate pANI (or ESQK) to the BellSouth E-911 tandem for routing the call to the appropriate PSAP as well as for retrieval of the AII information, which would have been dynamically updated with the caller's out-of-area telephone number in the AII database using the MPCA/PC interface. Thus, BellSouth's offering enables a VoIP provider to provide E-911 service to customers with out-of-area or "non-native" telephone numbers, as Vonage has requested-

We are pleased that this offer provides Vonage the elements needed to ensure "that no consumer is left outside of the E-911 umbrella." The offering outlined above provides Vonage, and any other interested VoIP provider, with use of the capabilities of our existing E-911 infrastructure. We look forward to working with you towards speedy implementation in order for Vonage to provide emergency services to its VoIP end users.

Sincerely,

William L. Smith
Chief Technology Officer

cc: Kevin J. Martin, Chairman FCC
        Kathleen Abernathy, FCC Commissioner
        Michael J. Copps, FCC Commissioner
        Jonathan S. Adelstein, FCC Commissioner
        Gregorys, Ballentine, President, APCO International
        Charles M. Davidson, Commissioner, Florida Public Service Commission
        Honorable Jeb Bush
        Stan Wise, Commissioner, Georgia Public Service Commission
        Deborah Taylor Tate, Director, Tennessee Regulatory Authority
        Troy King, Attorney General Alabama
        Honorable Charles "Chip" Pickering, Jr.
        Honorable Cliff Stearns